

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: October 30, 2003

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-184-Olympia-Grand Coulee No. 1)

TO: James A. Jellison – TFO/Olympia

Proposed Action: Vegetation Management along the Olympia-Grand Coulee # 1 287 kV (reference line ADNO 8328) and Olympia South Tacoma 230 kV transmission line corridor from structure 1/1 through structure 21/5. Right of way width averages 125 feet.

Location: The project area is located in Thurston County, Washington between the cities of Olympia to the West and Yelm to the East.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to maintain tall growing and unwanted species of vegetation along the right-of-way, access roads, and around tower structures along the subject transmission line corridor. Approximately 633 acres of right-of-way will be treated using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Approximately .95 miles of access roads will be managed using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Tower sites will be treated 30 feet from center of poles and/or tower legs using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Vegetation management is required for unimpeded operation, reliability, and maintenance of the subject transmission line. See Section 1 of the attached checklist for a complete description of the proposal.

Analysis: Please see the attached checklists for the resources present. Applicable findings and conservation and avoidance measures are discussed below.

Planning Steps:

1. Identify facility and the vegetation management need.

Tall growing and unwanted vegetation will be controlled and/or removed using selective and nonselective methods that will include hand cutting, mowing, and herbicidal treatment. All methods of herbicide treatment may be used (except aerial) dependent on site conditions/restrictions. This proposal covers approximately 633 acres of land between towers 1/1 through 21/5 on the Olympia Grand-Coulee No. 1 287kV line (corridor reference line). The entire width of the corridor needs to be managed.

2. *Identify surrounding land use and landowners/managers and any conservation and avoidance measures.*

The subject corridor traverses private, Federal, and Nisqually Indian reservation lands in Thurston County, Washington. Landowners requiring notification or under tree and brush agreements are shown in Section 2.3 and 2.4 of the attached checklists. Any remaining landowners will be contacted (letters, personal contact, door hangers, etc.) by BPA before and during the project. Any input received will be incorporated into the prescription/cut sheets.

3. *Identify natural resources and any conservation and avoidance measures.*

Section 3 of the attached checklist identifies the natural resources present in the area of the proposed work. The following cites resources found along with applicable conservation and avoidance measures:

Riparian Habitat:

Includes all wetlands, streams, and creeks meeting the definition of riparian habitat. Several areas were identified. See Section 3.1 of the checklists for a complete listing and conservation and avoidance methods.

Riparian Habitat Conservation and avoidance measures:

- Within 30.5 m (100 ft) of any stream, wetland, or other water body vegetation will be left intact where possible and only selective hand cutting and approved herbicide treatments will be implemented.
- Outside of 30.5 m (100 ft.) of any non Essential Fish Habitat (EFH) listed stream, wetland, or other water body. Available: all manual, spot and localized herbicide treatments. On slopes less than 20% there will be no disturbance within 35ft. of the stream or wetland. On slopes greater than 20% there will be no disturbance within the buffer.
- Within 35ft. to edge or high water mark of any non Essential Fish Habitat (Anadromous Fish Habitat) listed stream, wetland, or other water body only cut-stump and localized or spot chemical treatments using practically non-toxic to slightly toxic formulations of triclopyr TEA (Garlon 3A) may be used. Moderately toxic to very highly toxic herbicides (to aquatic species) or those herbicides containing a groundwater or surface water label advisory will not be used in this zone.
- Outside 35 ft. of any of non Essential Fish Habitat (Anadromous Fish Habitat) listed stream, wetland, or other water body cut-stump (spot) and localized chemical treatments of Triclopyr BEE (Garlon 4) may be used.

Essential Fish Habitat (EFH):

Several streams that cross the transmission line corridor are listed as Essential Fish Habitat for Chinook, Coho, and Pink Salmons, and summer and fall run Steelhead including the Deschutes River, Yelm Creek, and the Nisqually River. See section 3.3 of the checklist for details. By following the conservation and avoidance measures listed below and in the above listed C&A Measures for riparian habitat the project will have a **no effect** on anadromous fish Essential Habitat.

Essential Fish Habitat (EFH) Conservation and avoidance measures:

- All conservation and avoidance measures listed under riparian habitat will be implemented. Along with the more protective measures listed below.
- No herbicides will be applied within 100 feet of the waters edge of any T&E or Essential Fish Habitat listed water bodies. Spot spraying of non-toxic to practically non-toxic (to aquatic species) herbicides or those herbicides containing a groundwater or surface water label advisory may be applied 100-200 feet from the waters edge. Beyond 200 feet all vegetation management activities consistent with the Transmission System Vegetation Management Program Final EIS and ROD are available.

Drinking Water Supply:

Four drinking water wells were identified on or near the right of way boundary. See section 3.2 for a complete listing, description, and location of drinking water resources.

Drinking Water Supply Conservation and avoidance measures:

- Drinking water wells: No application of herbicides within a 164-foot radius of any water wells.

T & E Species and critical habitat:

A species list from the United States Fish and Wildlife Service (USFWS) for the Olympia Grand-Coulee transmission line vegetation management project was requested in October of 2003. The species list included:

Marbled Murrelet (<i>Brachyrampus marmoratus</i>)	
Threatened	
Bald Eagle Nesting territories (<i>Haliaeetus leucocephalus</i>)	Threatened
Wintering Bald Eagles (<i>Haliaeetus leucocephalus</i>)	Threatened
Bull Trout (<i>Salvelinus confluentus</i>)	Threatened
Northern Spotted Owl Critical Habitat	

Additionally a search of the National Marine Fisheries Service's web site shows the Puget Sound ESU for Chinook Salmon listed as:

Chinook Salmon Puget Sound ESU (<i>Oncorhynchus tshawytscha</i>)	Threatened
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T&E Species and Critical Habitat Conservation and avoidance measures:

- Review of BPA's Tview2 database, the Washington Natural Heritage Program and the Subbasin Data Browser shows Marbled Murrelets and Bull Trout do not occur in the vicinity of the project, therefore the project will have a **no effect** on those listed species.
- Review of BPA's Tview2 database, the Washington Natural Heritage Program and the Species list from USFWS shows Bald Eagle nesting territories and wintering sites occur along the transmission corridor between structures 10/1 – 11/1 and 15/3 – 16/3. Vegetation management activities will not occur in these areas and therefore the project will have a **no effect** on the listed species.

- Review of BPA's Tview2 database and the Washington Natural Heritage Program shows the project crosses through Designated Spotted Owl Critical Habitat Unit # 188. Vegetation management focuses on maintaining communities of low growing vegetation within the boundaries of the Right of way (ROW) easement. No trees with a basal diameter greater than 18 inches will be removed from the fringes of the ROW therefore the project will have a **no effect** on designated Critical Habitat for Spotted Owls.
- Review of BPA's Tview2 database, the NOAA website for protected resources, and the Subasin Data Browser show Fall run Chinook Salmon do occur in two rivers in the project vicinity. By following the conservation and avoidance measures listed under "Essential Fish Habitat (EFH) Conservation and avoidance measures" above this project will have a **no effect** on Listed Chinook Salmon in the Puget Sound ESU.

Cultural resources:

The Nisqually tribe is not aware of any cultural resources in the transmission corridor. Should any cultural resources be discovered during the vegetation management project, work will be stopped in the vicinity and the Nisqually tribe, the regional environmental specialist, and the BPA archeologist will be contacted. No work will continue in the area until the site has been thoroughly evaluated and released. See section 3.6 of the checklist for additional information.

4. Determine vegetation control methods.

Vegetation will be managed/removed using manual, mechanical, and chemical methods, as described in Section 4 of the attached checklists.

5. Determine debris disposal and re-vegetation methods, if necessary.

Debris will be disposed onsite using either chip, lop and scatter, or mulch techniques as described in Section 5.1 of the attached checklists.

Native grasses and low growing species are present in the areas of the right-of-way that will be managed. These populations will seed into the areas lightly disturbed by vegetation management. Re-vegetation needs will be determined onsite. Any areas identified with limited ground cover will be replanted with native plant species. See section 5.2 of the checklist for additional information.

6. Determine monitoring needs.

The project will be inspected during the work period, and again in early summer to determine vegetation management effectiveness and revegetation needs. The line will be patrolled annually after treatment to monitor the effectiveness of the treatment measures.

7. Prepare appropriate environmental documentation.

Findings: This Supplement Analysis finds that 1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; 2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. This Supplement Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA or ESA documentation is required.

/s/ Greg P. Tippetts

Greg P. Tippetts
Physical Scientist (Environmental)

CONCUR /s/ Thomas C. McKinney
Thomas C. McKinney
NEPA Compliance Officer

DATE: 11/03/2003

Attachment

cc:

L. Croff – KEC-4
T. McKinney – KEC-4
J. Meyer – KEP-4
J. Sharpe – KEPR-4
G. Tippetts – KEPR/Olympia
P. Key – LC-7
J. Hilliard Creecy – T-DITT2
K. Rodd – TF/DOB-1
D. Krauss – TFO/Olympia
S. Martin – TFO/Olympia
G. Westling – TFOF/Olympia
Environmental File – KEC-4
Official File – KEP-4 (EQ-14)

Vegetation Management Checklist

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

See Handbook — List of Right-of-way Components for checkboxes and the requirements for the components Rights-of-way, Access Roads, Switch Platforms, Danger Trees, and Microwave Beam paths.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Olympia-Grand Coulee No. 1 and Olympia South Tacoma	21 mi., 287Kv	250, variable	21 mi.

Right Of Way:

Right-of-Way – clearing in right-of-way

A combination of mulching the easement because of the Scotch broom and the cut, lop and scatter of tall growing species will be utilized to treat hazardous vegetation and this will be followed up with a herbicide treatment.

Transmission Structures – clearing around

All structures will be cut and chemically treated to 30 feet from the center of the pole or from the legs of each steel tower.

Access Road clearing - approximate miles – 0.95 miles

All access roads will be either C, L&S, mulched or chipped due to the encroachment of Scotch broom, blackberries, low and tall growing brush and trees then either stump or foliar chemical treatment will be applied.

1.2 Describe the vegetation needing management.

See handbook — [List of Vegetation Types](#), [Density](#), [Noxious Weeds](#) for checkboxes and requirements.

Vegetation Types

Douglas Fir	True Fir	Hemlock	Alder	Maple
Willows	Cottonwood	Wild Cherry	Noxious Weeds - Scotch Broom	Blackberries

1.3 List measures you will take to help promote low-growing plant communities. If promoting low-growing plants is not appropriate for this project, explain why.

See Handbook — for requirements and checkboxes.

Cut stump or follow-up herbicide treatments on sprouting-types species will be carried out to ensure that the roots are killed. Vegetation that will grow tall will be selectively eliminated before it reaches a height or density to begin competing with low-growing species.

1.4 Describe overall management scheme/schedule.

See Handbook - [Overall Management Scheme/Schedule](#).

Initial entry – All tall growing vegetation will be cut and chemically treat the stumps to prevent grow-in trees. Access, right-of-way roads and structure sites are to be cut and treated.

Subsequent entries – A follow-up chemical treatment to begin in the late spring or early summer of 2004.

Future cycles – Every 4 years, a maintenance contract will be necessary to treat sprouts. The use of herbicides on the initial and subsequent cycles should reduce the quantity and cost of work.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

2.1 List the types of landowners and land uses along your corridor.

See Handbook — [Landowners/Managers/Uses](#) for requirements, and [List of Landowners/Managers/Uses](#) for a checkbox list.

Landowners/Managers/Uses:

Rural Residential Property
Urban Residential
Indian Summer Home Association
Indian Summer Golf Course
Nisqually Indian Tribe Reservation
Department of Army

2.2 Describe method for notifying right-of-way landowners and requesting information (i.e., door hanger, letter, phone call, e-mail, and/or meeting).

Develop landowner mail list, if appropriate.

See Handbook — [Methods for Notification and Requesting Information](#) for requirements.

Olympia Region will send letters to the property owners about 2-4 weeks prior to cutting the brush. Door to door contact will be made where it is warranted.

2.3 List the specific land owner/land use measures — determined from the handbook or through your consultations with the entities — that will be applied.

See handbook — [Requirements and Guidance for Various Landowners/Uses](#) for requirements and guidance, also [Residential/Commercial](#), [Agricultural](#), [Tribal Reservations](#), [FS-managed lands](#), [BLM –managed lands](#), [Other federal lands](#), [State/ Local Lands](#).

Span		Landowner/use	Specific measures to be applied
From	To		
2/1 +1050	2/2 +450	Private Owner	T&B Agreement, LU#82138
2/4 +150	2/5 +100	Home Depot	Parking Lot and Shrubs
2/5 +800	3/1	Flooring Company	Parking Lot and Shrubs
3/3 +150	3/4 + 450	Private Owner	Transfer of Parking Lot and Trees
3/4	3/5 + 600	Private Owner	Nursery
9/1+ 50	9/1 + 500	Private Owner	T&B Agreement, LU#010105

10/1 + 450	10/4 + 500	Private Owner	Nursery, LU#84113
20/2 + 500	20/2 + 700	Private Owner	Orchard, LU#89070
20/2 + 700	20/3 + 200	Private Owner	T&B Agreement, LU#85036
21/1 + 0	21/2 + 200	Nisqually Pines Community Club	T&B Agreement, LU#88030

2.4 Review any existing landowner agreements (e.g. tree/brush Permits or Agreements). List in table above any provisions that need to be followed and where they are located.

See handbook — [Landowner Agreements](#) for requirements.

N/A

2.5 List any known casual informal use of the right-of-way by non-owner publics. List any constraints or measure's to take due to the informal use.

See handbook — [Casual Informal Use of Right-of-way](#) for requirements.

N/A

2.6 List other potentially affected people, agencies, or tribes (that are not landowners/managers) that need to be notified or coordinated with. Describe method of notification and coordination.

See handbook — [Other Potentially Affected Publics](#) for requirements and suggestions.

I have contacted Linda Ilwala, Cultural Resource Specialist of the Nisqually Tribe regarding his knowledge of any cultural sites on the Olympia-Grand Coulee easement. They are not aware of any cultural sites.

3. IDENTIFY NATURAL RESOURCES

See Handbook — [Natural Resources](#)

3.1 List any water resources (streams, rivers, lakes, wetlands) that may be impacted by vegetation control activities. For each water body describe the control methods and requirements or mitigation measures that will be used.

See Handbook — [Water Resources](#) for requirements for working near water resources including buffer zones.

Span		Water body	T&E	Method	Herbicide	Application Technique	Buffer	Other
From	To							
1/4+765O-T#1	965	Wetlands	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
1/5+0 O-T#1	1025	Wetlands	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
1/6 +0 O-T#1	800	Wetlands	No	Skip				
1/6 +800 O-T#1	1121	Wetlands	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
Olympia-	South	Tacoma	Line					
1/4 +0	300	Wetland	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting

1/4 +300	843	Wetland	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
2/1 +100	200	Wetland	No	Skip				
2/1+ 200	1100	Trosper Lake	No	Skip				
3/7+515	585	No name creek	No	Skip				
4/1+150	700	Wetlands	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
4/6 +1000	1275	Slough	No	Skip				
5/1 + 0	335	Slough	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
5/2+0	325	Deschutes River	Yes	Cut Stump	Garlon 3A	Spot Treat 100-200'	100	Selective Cutting
5/6 +816	851	Drain ditch	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
6/1+ 0	35	Drain ditch	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
11/4+200	450	Eaton creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
18/2 + 200	600	Thomas Creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
18/3+ 75	145	Centralia Power Canal Spillway	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
19/2 + 200	300	Centralia Canal	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
19/2 + 500	900	Yelm Creek	Yes	Cut Stump	Garlon 3A	Spot Treat 100-200'	100'	Selective Cutting
19/4+ 900	1100	Yelm creek	Yes	Cut Stump	Garlon 3A	Spot Treat 100-200'	100'	Selective Cutting
21/5 + 0	200	Nisqually River	Yes	Cut Stump	Garlon 3A	Spot Treat 100-200'	100'	Selective Cutting

3.2 If planning to use herbicides, list locations of any known irrigation source, wells, or springs (landowners maybe able to provide this info if requested).

See Handbook — [Herbicide Use Near Irrigation, Wells or Springs](#) for buffers and herbicide restrictions.

Span		Well/irrigation/or spring	Herbicide	Buffer	Other notes/measures
From	To				
1/4 + 185	185	Well	No herbicide	164' Radius	Right edge of R/W
19/3 + 750	750	Well	No Herbicide	164' Radius	Right edge of R/W
21/1+ 0	21/2 + 100	2 Wells w/in Watershed of Nisqually Pines Development	No herbicide	164' Radius	Wells w/in chain link fence area.

3.3 List below the areas that have Threatened or Endangered Plant or Animal Species and the name of the species, and any special measures that need to be taken due to their presence. Attach any BAs, T&E maps, or letters from US Fish and Wildlife.

See Handbook — [T&E Plant or Animal Species](#) for requirements and determining presence.

Span		T&E Species	Method/mitigation or avoidance measures
From	To		
5/2+0	325	Anadromous Salmon	Selective cutting of trees only in riparian zone and/or cutting trees tops that are within 50' of the conductor at max sag. Shrubs will not be cut that are less than 10' height where the ground to conductor clearance is less than 50' at max sag. No herbicide treatment within 100' of stream bank. 100-200' from the stream bank, chemical treatment of the stumps and/or foliar application with Garlon 3A.
10/1	11/1	Bald Eagle	Seasonal restrictions from 1/1/04 to 7/15/04, no chainsaw cutting activity.
14/3	21/5	Spotted Owl Critical Habitat Unit 188	Seasonal restrictions from 3/1/03 to 8/24/04, no chainsaw cutting activity. In addition, modified seasonal restriction from 8/24 to 9/15/03, there will be no chainsaw activity 2 hours after and before sunset.
15/3	16/3	Bald Eagle	Seasonal restrictions from 1/1/04 to 7/15/04, no chainsaw cutting activity.
19/2 + 500	900	Anadromous Salmon	Same treatment as noted in 5/2+0 to 325.
19/4+ 900	1100	Anadromous Salmon	Same treatment as noted in 5/2+0 to 325.
21/5 + 0	200	Anadromous Salmon	Same treatment as noted in 5/2+0 to 325.

3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.

See Handbook — [Protecting Other Species](#) for requirements.

N/A

3.5 List any visually sensitive areas and the measures to be taken at these areas.

See Handbook — [Visual Sensitive Areas](#) for requirements.

N/A

3.6 List areas with cultural resources and the measures to be taken in those areas.

See Handbook – [Cultural Resources](#) for requirements.

Span		Describe sensitivity	Method/mitigation measures
From	To		
1/1	21/5	Cultural Sites	The Nisqually Tribe does not know of any cultural sites on this transmission corridor. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the local tribe will be contacted as well as the BPA Environmental Specialist.

3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.

See Handbook – [Steep/Unstable Slopes](#) for requirements.

N/A

3.8 List areas of spanned canyons and the type of cutting needed.

See Handbook – [Spanned Canyons](#) for requirements.

N/A

4. DETERMINE VEGETATION CONTROL METHODS

See Handbook — [Methods](#)

4.1 List Methods that will be used in areas not previously addressed in steps above.

See Handbook — [Manual](#), [Mechanical](#), [Biological](#), and [Herbicides](#) for requirements for each of the methods.

Span		Methods, including herbicide active ingredient, trade name, application technique
To	From	
1/1	21/5	For non-sensitive areas (spans) cut stump/basal treatment with 25% Garlon 4 and 75% Forest Crop Oil (FCO). 50/50 Accord or Garlon 3A/Water for stump treatment in the non-T&E listed creek riparian zones and 100' buffer on no herbicide treatment for T&E listed creek. A late and early summer follow-up foliar treatment with Garlon 3A and Escort on sprouting stumps and/or brush. Initially, foliar treat Scotch broom as well as a follow up treatment in the spring-summer.

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

5.1 Describe the debris disposal methods to be used and any special considerations.

See Handbook — [Debris disposal](#) for a checkbox list and requirements.

Debris Disposal:

Chip (Mechanical brush disposal unit cuts brush into chips 4 in. or less in diameter, and spread over ROW, piled on ROW, or trucked off site. Trunks too large for the chipper are limbed and the limbs chipped. Trunks are placed in rows along the edge of the right-of-way or scattered, as the situation requires.)

Lop and Scatter (Branches of a fallen tree are cut off (lopped) by ax or chainsaw, so the tree trunk lies flat on the ground. The trunks are occasionally cut in 1-to-2-m (4-to-8-ft.) lengths. The cut branches and trunks are then scattered on the ground, laid flat, and left to decompose.)

Mulch (Mulching is a debris treatment that falls between chipping and lop-and-scatter. The debris is cut into 1-to-2-ft. lengths, scattered on the right-of-way and left to decompose. This method is used when terrain and conditions do not allow the use of mechanical chipping equipment.)

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).

See Handbook — [Reseeding/replanting](#) for requirements.

N/A

Native grasses are present on the entire right-of-way that will seed into the areas that will have lightly disturbed soil predominately located on the right-of-way roads. BPA expects 2-3 vehicles of the brush contractor and 1 contract inspector's vehicle will be present on the site. A brush machine will mulch the structure sites and right-of-way roads where scotch broom and blackberries are present.

5.3 If not using native seed/plants, describe why.

N/A

5.4 Describe timing and any follow-up that will need to take place to ensure germination/success of seeding/planting.

Monitoring of the success of the brush-cutting program will begin the spring in which evaluation of soil erosion as a result of the brush-cutting program will be made. If grass seeding is necessary, native grass seed will be applied.

6. DETERMINE MONITORING NEEDS

See handbook — [Monitoring](#) for requirements.

6.1 Describe the follow-up/monitoring cycle that will be used to evaluate the effectiveness of the vegetation control methods used.

Monitoring of the effectiveness of the herbicide treatment will begin in the spring and follow up treatment of cut stump/basal or foliar treatment of target vegetation. The mixture of the product is 25% Garlon 4 and 75% FCO for stump treatment or 97% water, 3% Garlon 3A with 2 oz./ ac. of Escort for foliar treatment. Depo-RTU will be utilized to reduce drift when necessary.

6.2 Describe any follow-up or monitoring needed to determine if mitigation measures were effective.

Annually patrol the transmission line by the line crew and the Natural Resource Specialist will periodically monitor the right-of-way for effective mitigation measures.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — [Prepare Appropriate Environmental Documentation](#) for requirements. . Also prepare Supplement Analysis — [Supplement Analysis](#) — for signature.

7.1 Describe any potential project impacts or project work that are different than those disclosed in the Transmission System Vegetation Management Program EIS. Describe how those differences impact natural resources and if the differences are “substantial”.

All proposed brush cutting and chemical treatment activities on this corridor is noted in the EIS.

7.2 Is there a need for additional NEPA documentation (i.e. Forest Service requirement, Record of Decision, supplemental EIS)? If so, attach.

No